

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., et al., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re: Docket No. ____

**ORDER AUTHORIZING LAVVAN, INC. TO FILE UNDER SEAL ITS
(I) LIMITED DIP OBJECTION TO DIP MOTION AND (II) MOTION FOR
MODIFICATION OF AUTOMATIC STAY**

Upon the motion (the “**Motion**”)² of Lavvan, Inc. (“**Lavvan**”) for an order under sections 105(a) and 107 of the Bankruptcy Code, Bankruptcy Rule 9018, and Local Rule 9018-1, authorizing Lavvan to file under seal the Limited DIP Objection and Stay Relief Motion; and the Court having reviewed the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that this Court may enter an order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED.
2. Lavvan is authorized to file under seal those portions of the Limited DIP Objection and the Stay Relief Motion containing the Confidential Information.
3. The Confidential Information shall remain under seal, and shall not be made available to anyone, except Lavvan shall provide unredacted copies of the Limited DIP Objection and the Stay Relief Motion to the Court, the U.S. Trustee, counsel to the Debtors, counsel to Foris Ventures, LLC, and counsel to the Official Committee of Unsecured Creditors.
4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. Lavvan is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.
6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.